

FILEDIN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

NOV 27 2018

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA)

v.)

QUINYAHTA ROCHELLE)

Criminal No. 18-323

(18 U.S.C. §§ 1344 and 1028A(a)(1))

INDICTMENT**COUNT ONE**

The grand jury charges:

1. From in and around January 2018, and continuing thereafter to in and around August 2018, in the Western District of Pennsylvania, the defendant, QUINYAHTA ROCHELLE, and other individuals both known and unknown to the grand jury, did knowingly execute and attempt to execute a scheme and artifice to defraud Chase Bank, a federally insured financial institution, and to obtain moneys, funds, credits, assets, securities and other property owned by and under the custody and control of Chase Bank, by means of false and fraudulent pretenses, representations and promises, well knowing that the pretenses, representations and promises would be and were false and fraudulent.

2. It was part of the scheme and artifice that the defendant, QUINYAHTA ROCHELLE, and other individuals both known and unknown to the grand jury, used the internet to purchase credit card account information and other means of identification stolen from customers of Chase Bank.

3. It was further part of the scheme and artifice that the defendant, QUINYAHTA ROCHELLE, and other individuals both known and unknown to the grand jury, used this stolen credit card account information to pay for goods and services.

4. It was further part of the scheme and artifice that, in using this stolen credit card account information to pay for goods and services, the defendant, QUINYAHTA ROCHELLE,

and other individuals both known and unknown to the grand jury, represented that they were authorized to use the credit card account information when, as they well knew at the time, they were not.

5. It was further part of the scheme and artifice that the defendant, QUINYAHTA ROCHELLE, created counterfeit credit cards for others, both known and unknown to the grand jury, using stolen credit card account information.

All in violation of Title 18, United States Code, Section 1344.

COUNT TWO

The grand jury further charges:


6. On or about March 18, 2018, in the Western District of Pennsylvania, the defendant, QUINYAHTA ROCHELLE, during and in relation to the felony violation of Bank Fraud as set forth in Count One, did knowingly possess and use, without lawful authority, the means of identification of another person, specifically the credit card account information of an individual known to the grand jury as C.H.


All in violation of Title 18, United States Code, Section 1028A(a)(1).

NOTICE OF PENALTY FOR OFFENSE COMMITTED WHILE ON RELEASE

7. As the defendant, QUINYAHTA ROCHELLE, had been released pursuant to Chapter 207 of Title 18, United States Code, at the time of the commission of the offenses alleged in Counts One and Two of this Indictment, each of which is a felony, should the defendant be convicted of any of these counts of the Indictment, the defendant is subject to the term of imprisonment prescribed in Title 18, United States Code, Section 3147(1) in addition to the penalties otherwise provided by law.

A True Bill,


Foreperson


SCOTT W. BRADY
United States Attorney
PA ID No. 88352